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U.S. DISTRICT COURT
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DISTRICT OF UTAH
BY: _____
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

VIATRIZ HERRERA-MARTINEZ, and
ANGEL RODRIGUEZ-NAVARRO,

Defendants.

**SECOND SUPERSEDING
INDICTMENT**

21 U.S.C. § 841(a)(1),
DISTRIBUTION OF
METHAMPHETAMINE
(Counts 1-3, Herrera-Martinez &
Rodriguez-Navarro)

21 U.S.C. § 841(a)(1),
DISTRIBUTION OF
METHAMPHETAMINE
(Count 4, Rodriguez-Navarro)

21 U.S.C. § 841(a)(1),
POSSESSION OF
METHAMPHETAMINE WITH
INTENT TO DISTRIBUTE
(Count 5, Herrera-Martinez)

21 U.S.C. § 853, CRIMINAL
FORFEITURE

Case: 2:12-CR-00603-DN

Judge David Nuffer

The Grand Jury charges:

COUNT 1

On or about August 6, 2012 in the Central Division of the District of Utah,

VIATRIZ HERRERA-MARTINEZ and ANGEL RODRIGUEZ-NAVARRO, defendants herein, did knowingly and intentionally distribute fifty (50) grams or more of methamphetamine, a schedule II controlled substance, within the meaning of 21 U.S.C. § 812, and did aid and abet therein, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. §2; and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 2

On or about August 16, 2012 in the Central Division of the District of Utah,

VIATRIZ HERRERA-MARTINEZ and ANGEL RODRIGUEZ-NAVARRO, defendants herein, did knowingly and intentionally distribute fifty (50) grams or more of methamphetamine, a schedule II controlled substance, within the meaning of 21 U.S.C. § 812, and did aid and abet therein, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. §2; and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 3

On or about September 16, 2012 in the Central Division of the District of Utah,

VIATRIZ HERRERA-MARTINEZ and ANGEL RODRIGUEZ-NAVARRO, defendants herein, did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a schedule II controlled substance, within the meaning of 21 U.S.C. § 812, and did aid and abet therein, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. §2; and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 4

On or about September 19, 2012 in the Central Division of the District of Utah,
ANGEL RODRIGUEZ-NAVARRO,
defendant herein, did knowingly and intentionally distribute fifty (50) grams or more of
methamphetamine, a schedule II controlled substance, within the meaning of 21 U.S.C. § 812,
and did aid and abet therein, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. §2; and
punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 5

On or about September 19, 2012, in the Central Division of the District of Utah,
VIATRIZ HERRERA-MARTINEZ,
the defendant herein, did knowingly and intentionally possess with intent to distribute fifty (50)
grams or more of methamphetamine, a schedule II controlled substance within the meaning of 21
U.S.C. § 812, and did aid and abet therein, in violation of 21 U.S.C. § 841(a)(1); and punishable
pursuant to 21 U.S.C. § 841(b)(1)(A).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

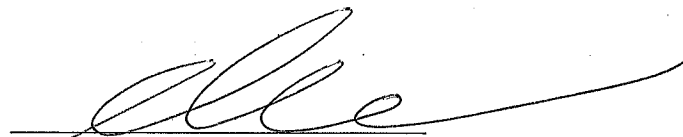
As a result of committing the felony offenses as alleged above, each of which is
punishable by imprisonment for more than one year, the above-named defendants shall forfeit to
the United States pursuant to 21 U.S.C. § 853 any and all property constituting or derived from
any proceeds the defendants obtained directly or indirectly as a result of the said felony offenses
and any and all property, real and personal, used or intended to be used in any manner or part to
commit and to facilitate the commission of the violations of 21 U.S.C. § 841(a)(1), including but
not limited to the following: \$3,130 U.S. currency.

A TRUE BILL:

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GRAND JURY FOREPERSON

DAVID B. BARLOW
United States Attorney

A handwritten signature in black ink, appearing to read 'J. Taylor', written over a horizontal line.

JACOB S. TAYLOR
Special Assistant United States Attorney